

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and  
others similarly situated,

Plaintiff,

v.

REGISTER.COM, INC.

Defendant.

Case No.: 1:25-cv-00275-JPH-MJD

Judge: Robert J. White

Magistrate Judge: Mark J. Dinsmore

**JOINT REPORT ON THE STATUS OF DISCOVERY**

Pursuant to this Court’s June 24, 2025 Order, ECF No. 29, Tiffany Lewis (“Plaintiff”) and Register.com, Inc. (“Defendant”) (jointly, the “Parties”) submit this Joint Report on the Status of Discovery. The information provided herein is intended to supplement the Status Report submitted by the Parties on July 25, 2025.

**Joint Report on the Status of Discovery**

1. A detailed description of all discovery completed to date.
  - Following the 26(f) conference, the Plaintiff provided her First Set of Discovery to the Defendant on June 12, 2025.
  - Defendant provided its First Set of Discovery to Defendant on August 4, 2025.
  - The Parties have both provided initial disclosures.
  - The Parties have both filed their Preliminary Witness and Exhibit Lists.
  - On August 12, 2025, Defendant provided its Responses to Plaintiff’s First Set of Discovery and is supplementing its production of records and documents on a rolling basis.
  - On August 20, 2025, the Parties conferred regarding Defendant’s Discovery Responses.
  - Plaintiff has provided, and Defendant has responded to, Plaintiff’s Statement of Special Damages.

2. A detailed description of all discovery presently scheduled or pending, including the due dates for any pending discovery requests and the scheduled dates for any depositions, and the identity of the counsel responsible for completing such discovery.

- Plaintiff's Responses to Defendant's First Set of Discovery Requests are due September 4, 2025.
- Neither party has scheduled any depositions.

3. A detailed description of any discovery disputes presently pending, including the status of the resolution of the dispute and the identity of the counsel responsible for resolving the dispute.

- On August 20, 2025, the Parties conducted a meet and confer to discuss Defendant's Responses to Plaintiff's First Set of Discovery Requests and Defendant's objections to certain requests contained therein. Counsel for Defendant, Abbey Block, reiterated Defendant's position that class-wide merits-based discovery was unnecessary and improper prior to class certification. Counsel for Plaintiff, Anthony Paronich, reiterated Plaintiff's disagreement with this position. The Parties, by and through Ms. Block and Mr. Paronich, agreed to alert the Court to this ongoing dispute and to request the opportunity to discuss the matter with the Court during the Discovery Status Conference scheduled for August 27, 2025. Pursuant to this agreement, Mr. Paronich emailed the Court on August 27, 2025, informing it of the dispute.

4. A detailed description of all discovery that is planned to be completed within the 28-day period following the report, including the identity of the counsel responsible for completing such discovery.

- Anthony Paronich, counsel for the Plaintiff, intends to notice the deposition(s) of relevant individual(s) identified therein.
- Once Plaintiff's Discovery Responses are received, Abbey Block, counsel for Defendant intends to notice the deposition(s) of relevant individual(s) identified therein.

5. A description of all known discovery remaining to be completed in this matter, including a proposed timetable for the completion of such discovery and the identity of the counsel responsible for completing such discovery.

- Aside from the items notated above, Plaintiff's future discovery will include a Fed. R. Civ. P. 30(b)(6) Notice and expert report related to identification of putative class members based on the Defendant's discovery responses and deposition.
- Aside from the items noted above, Defendant's future discovery efforts are likely to hinge on the document production and discovery responses received.

6. Any other discovery issues any party believes should be brought to the attention of the Court so as to avoid any further delays in the completion of discovery in this matter.

- Plaintiff disagrees with the objections raised by Defendant in its responses to Plaintiff's First Set of Discovery Responses and maintains the position that class-wide merits-based discovery is appropriate at this juncture. As Plaintiff will explain in her opposition to Defendant's motion to bifurcate discovery, there is significant and substantial overlap between class certification and merits issues in TCPA cases, especially those that are focused on automated calls to individuals that had no relationship with the Defendant, like the Plaintiff here.
- Defendant's preparation of responses to Plaintiff's discovery requests exacerbated Defendant's concerns regarding the volume and nature of information requested and the time and resources needed to respond to Plaintiff's requests (particularly with regard to the merits of the putative class action members' claims prior to the certification of the class). Defendant objected to the requests which sought information relevant to the merits of the potential class members' claims (e.g., data concerning specific telephone numbers, names, etc.). Defendant will address these concerns in its forthcoming motion for bifurcation of discovery but has otherwise provided fulsome responses to Plaintiff's unobjectionable discovery requests.
- Defendant intends to file a Motion to Strike Class Allegations pursuant to Fed. R. Civ. P. 23, on the basis that the class definition, as proposed in the Amended Complaint, is facially deficient.

Dated: August 25, 2025

/s/ Anthony I. Paronich  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of August 2025, I filed the foregoing with the Court's electronic filing system, which will automatically provide notice to all counsel of record.

Dated: August 25, 2025

/s/ A. Jeff Ifrah  
A. Jeff Ifrah